

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KNOWYOURMEME.COM NETWORK,
PALISADES CAPITAL, INC.,

Plaintiff(s),

-against-

JACOB NIZRI, WE ENDEAVOR LTD.,
LITERALLY MEDIA LTD., MINDAD INC.
MINDAD DIGITAL LTD, ELIA MEDIA LTD.,
ORI ELRAVIV and DOES 1 through 20

Defendants(s)
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C.A. NO. 1:20-CV-09869-GBD-JLC

VIA ECF

re: Knowyourmeme.com Network v. Nizri et al

The Honorable George Daniels

United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

The plaintiff brings to the court's attention that the wars in Israel, a matter of great concern to all involved, are still raging despite their request for relief from the Forum Inconveniens Order. This would require the plaintiff and many other Americans to travel to Israel against a U.S. State Department Travel Advisory. It has been 105 days since the plaintiff filed motion 60b, and there has been no resolution. While understanding the court's heavy workload and grateful for their consideration, the plaintiff is conflicted as they must also consider their own well-being and safety in this situation.

If an Oral Hearing is deemed necessary by counsel, it could be helpful in discussing the ongoing war and its effect on travel restrictions. The hope of our client is that this wise Court will grant the motion and remand the case to State

Court where there are more resources available and proceedings had already begun before removal to Federal Court.

We stand ready to provide any additional information or evidence needed to prove that two wars are still ongoing in Israel, causing significant prejudice and losses for our small U.S. business. It is essential for a business dispute involving breach of contract to have timely resolution, but with ongoing wars in play, this seems like an uphill battle.

Dated: December 13, 2024

Respectfully submitted

Constants Law Offices, LLC.

By /s/ Alfred C. Constants III

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